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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC COMPANY,
Debtors**

- Affects PG&E Corporation
 - Affects Pacific Gas and Electric Company
 - Affects both Debtors

* All papers shall be filed in the Lead Case, No. 19-30088 (DM).

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION CONTINUING
HEARING AND FIXING BRIEFING
SCHEDULE ON MOTION OF
RANDALL ZAMARRA FOR RELIEF
FROM THE AUTOMATIC STAY
AND ABSTENTION UNDER 28 U.S.C.
1334(C)(1)**

Related to Dkt. No. 9918, 9986

Current Hearing Date: February 9, 2021
New Hearing Date: February 24, 2021
Time: 10:00 am

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
2 “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” and as reorganized
3 pursuant to the Plan,¹ the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter**
4 **11 Cases**”), on the one hand, and Randall Louis Zamarra (“**Zamarra**”, and, together with the
5 Debtors and Reorganized Debtors, the “**Parties**”), on the other hand, by and through their
6 respective counsel, hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter
9 11 Cases in the United States Bankruptcy Court for the Northern District of California (the
10 “**Bankruptcy Court**”). The Chapter 11 Cases are being jointly administered for procedural
11 purposes only pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

12 B. By Order dated June 20, 2020 [Dkt. No. 8053] (the “**Confirmation Order**”), the
13 Bankruptcy Court confirmed the Plan. The Effective Date of the Plan occurred on July 1, 2020.
14 See Dkt. No. 8252.

15 C. On December 28, 2020, Zamarra filed the *Motion for Relief From the Automatic*
16 *Stay and Abstention Under 28 U.S.C. 1334(C)(1)* [Dkt. No. 9918] (the “**Motion**”), in which
17 Zamarra requests that the Bankruptcy Court modify the automatic stay to permit him to file and
18 prosecute a cross-complaint (the “**Cross-Complaint**”) asserting claims against the Utility in the
19 matter of *Ford v. Zamarra et al.*, Case No. RG19035284 (the “**State Court Action**”), currently
20 pending in the Superior Court of California, County of Alameda. Zamarra initially designated the
21 Motion for a hearing on January 27, 2021, but has noticed it for February 9, 2021 (the
22 “**Hearing**”). See Dkt. No. 9986.

23 D. Sections 10.5 and 10.6 of the Plan and Paragraphs 51 and 52 of the Confirmation
24 Order establish the “**Plan Injunction**,” which supersedes the automatic stay in most respects and

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26 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in
27 the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June*
28 *19, 2020* (as may be further modified, amended or supplemented from time to time, and together
with any exhibits or scheduled thereto, the “**Plan**”).

1 expressly prohibits (1) commencing, conducting, or continuing in any manner, directly or indirectly,
2 any suit, action, or other proceeding of any kind with respect to any pre-petition claims against the
3 Debtors or Reorganized Debtors, and (2) any effort to enforce, collect or recover on any judgment
4 based on any pre-petition claims.

5 E. The Parties are attempting to consensually resolve their issues regarding the Motion,
6 and seek to continue the Hearing and extend the briefing deadlines in order to provide additional
7 time to facilitate such potential resolution.

8 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE
9 INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS
10 STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE
UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT
TO ORDER, THAT:**

11 1. The Motion, although denominated as a motion for relief from the automatic stay of
Bankruptcy Code §362, shall be considered as requesting the Bankruptcy Court to modify the Plan
Injunction to permit Zamarra to file and prosecute the Cross-Complaint in the State Court Action.

14 2. The Hearing shall be continued to February 24, 2021 at 10:00 a.m. (Pacific Time).

15 3. The time for the Reorganized Debtors to submit any opposition to the Motion shall be
extended to February 10, 2021.

17 4. The time for Zamarra to submit any reply in furtherance of the Motion shall be
extended to February 17, 2021.

19 5. This Stipulation may be executed in counterparts, each of which shall be deemed an
original but all of which together shall constitute one and the same agreement.

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1 6. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
2 controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

3 Dated: January 25, 2021

4 WEIL, GOTSHAL & MANGES LLP
5 KELLER BENVENUTTI KIM LLP

6 */s/ Peter J. Benvenutti*

7 Peter J. Benvenutti

8 *Attorneys for Debtors
9 and Reorganized Debtors*

10 Dated: January 25, 2021

11 LONG & LEVIT LLP

12 
Jennifer A. Becker

13 *Attorneys for Randall Louis Zamarra*